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Hearing Date: November 4, 2010

Hearing Time: 10:00 a.m.

Objection Deadline: October 28, 2010

*Attorneys for Irving H. Picard, Esq., Trustee
for the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff Investment
Securities LLC And Bernard L. Madoff*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK
SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (BRL)

SIPA Liquidation

(Substantively Consolidated)

**NOTICE OF TRUSTEE'S MOTION FOR AN ORDER PURSUANT TO SECTION 105(a)
OF THE UNITED STATES BANKRUPTCY CODE AND RULES 2002 AND 9019 OF
THE FEDERAL RULES OF BANKRUPTCY PROCEDURE ESTABLISHING
PROCEDURES FOR APPROVAL OF SETTLEMENTS**

PLEASE TAKE NOTICE that, pursuant to section 105(a) of the United States

Bankruptcy Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”), and Rules 2002 and 9019 of the Federal Rules of Bankruptcy Procedure, and upon the accompanying motion (the “Motion”), Irving H. Picard, Trustee, through his undersigned counsel, will move this Court at the United States Bankruptcy Courthouse at One Bowling Green, New York, New York, on **November 4, 2010 at 10:00 a.m.**, for an order granting authority and establishing procedures for the Trustee to settle, without further Court order, certain disputes with initial or subsequent BLMIS transferees against whom the Trustee has claims under his avoidance powers.

PLEASE TAKE FURTHER NOTICE that written objections to the Motion must be filed with the Clerk of the United States Bankruptcy Court, One Bowling Green, New York, New York 10004 by no later than **4:00 p.m. on October 28, 2010** (with a courtesy copy delivered to the Chambers of the Honorable Burton R. Lifland) and must be served upon (a) Baker & Hostetler LLP, counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: Marc E. Hirschfield, Esq. and (b) the Securities Investor Protection Corporation, 805 Fifteenth Street, NW, Suite 800, Washington, DC 20005, Attn: Kevin H. Bell, Esq. Any objections must specifically state the interest that the objecting party has in these proceedings

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and the specific basis of any objection to the Motion.

Dated: New York, New York
October 21, 2010

By: s/Marc E. Hirschfield
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SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and Bernard L. Madoff*